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April 30, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W. – Portals
Washington, DC 20554

RE: Bell Atlantic Corp. and GTE Corp., CC Docket No. 98-184

Dear Ms. Dortch:

Verizon is provided the enclosed letter to Carol Mattey on April 2, 2002. Verizon had discovered a small typographical error in the recently approved redline of the business rules from the second semi annual review and requested concurrence to treat this error as just that, a typographical error, and continue to report the measurement as the Merger Order intended. Please let me know if you have any questions

Sincerely,

Dee May/AR

Enclosure

cc: C. Mattey
      M. Stone
      D. Johnson

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April 2, 2002

Ms. Carol Mattey
Federal Communications Commission
455 12th Street, S.W.
Washington, DC 20554

Ms. Mattey:

Verizon has discovered a small typographical error in the recently approved redline of the business rules from the second semi annual review and requests your concurrence to treat this error as just that, a typographical error, and continue to report the measurement as the Merger Order intended.

The typographical error involves a footnote that should appear in the Performance Standard section of the OR-1 and OR-2 business rules. The same footnote number was supposed to appear under Special Services next to Orders with $\geq$ 6 Lines: 72 hours for both Resale and UNE products for OR-1 and OR-2. (The footnote number for OR-1 was number 7 and for OR-2 was number 10.) However, incorrect footnote numbers appeared for UNE in the original merger order for both OR-1 and OR-2. In that document, footnote number 4 appeared under Special Services next to Orders with $\geq$ 10 Lines: 72 hours, referencing a footnote that was clearly not relevant. In the redline document that was provided to you on August 10, 2001 the incorrect footnote number was dropped, but due to a typographical error, it was not replaced with the correct footnote references.

Verizon has always understood the intent of the metric to measure all orders requiring facility verification in the same manner and has instituted various corrective actions to report the measurement in accordance with this understanding. Adding the correct footnote references at this time would simply clarify business rules to accurately reflect the way in which the metric is intended to be measured.

I have attached a redline of the affected business rules showing the corrected footnote references.

If you have any questions, please do not hesitate to call me.

Sincerely,

cc: M. Carey
W. Dever
M. Stone

Ordering (OR)

Function:
OR-1 Order Confirmation Timeliness

Definition:

Resale & UNE:

> *Order Confirmation Response Time:* The amount of elapsed time (in hours and minutes) between receipt of a valid order request date and time stamp and distribution of a service order confirmation. Orders that are rejected will have the clock re-started upon receipt of a valid order. Partial migrations for less than 6 lines – with accounts that include more than 5 lines that must be rearranged will be treated as 6 lines or greater. *Percent of Orders Confirmed On Time:* The percentage of orders confirmed within the agreed upon timeframes as specified in the Performance Standards.

Trunks:

> The amount of time in business days between receipt of a clean ASR (received date restarted for each SUPP) and distribution of a firm order confirmation. Measures service orders completed between the measured dates.

Notes:

(1) Rejected Orders – Orders failing "Basic front-end edits" [4] are not placed in the PON Master File.

(2) For LSRs only, effective with the capability to identify resent confirmations due to Verizon error, Verizon will include in the Order confirmation Timeliness measurement CLEC requests for resent confirmations that are submitted electronically as well as resent confirmations due to Verizon's error in initial confirmation[5]. The measurements are based on confirmed orders.

(3) If no order confirmations time exists due to a missing order confirmations, for LSRs only, Verizon will use the completion notification time.

(4) The Ordering sub-metrics data reported in the monthly C2C reports only include orders confirmed in the calendar month.

(5) The Pre-qualified Complex category includes 2-wire Digital, 2-wire xDSL Loop, and 2-wire xDSL Line Sharing orders that were pre-qualified.

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[4]   Basic front-end edits – see Glossary.

[5]   Resent confirmations due to CLEC error – such as duplicate PON numbers, or confirmations resent to reschedule a missed provisioning appointment – either due to CLEC, End User or Verizon reasons are not counted as resent confirmations.
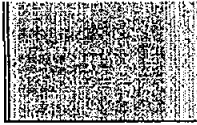
Exclusions:
Resale & UNE:
• Verizon Test Orders [6]
• Weekend and Holiday Hours (Other than Flow-through) – Weekend Hours are from 5:00pm Friday to 8:00am Monday. Holiday Hours are from 5:00pm of the business day preceding the holiday to 8:00am of the first business day following the holiday. These hours are excluded from the elapsed time when calculating the response times for non-flow through requests. Holidays vary by state and are published on the Verizon Web Site.
• SOP scheduled downtime hours (Flow-through). Scheduled downtime may vary by state. Each month there is a scheduled release on the third Saturday with a later start time on the following Sunday. For major release weekends, such as NPA splits, SOP downtime may be extended. All such extensions will be communicated to CLECs in advance of the release in accordance with Verizon Change Management guidelines.
• Any order (PON) designated by a CLEC to be excluded (e.g., special projects). CLEC must provide written authorization for any exclusion. (This applies to any metric as specified by CLEC)
• Verizon Affiliate data will be excluded from all CLEC aggregate performance (in all measures)
• DSL Orders requiring loop conditioning. (Due date can not be provided until conditioning is complete)

Report Dimensions	
Company:	Geography:
• CLEC Aggregate	• State
• CLEC Specific	

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[6]   Verizon-Test Orders – see Glossary.

Performance Standard: OR-1 Order Confirmation Timeliness		
95% On Time According to schedule below:		
Resale:	**UNE:**	**Interconnection Trunks:**
Electronically Submitted Orders: *POTS/Pre-Qualified Complex:* • Flow-Through Orders: 2 Hours • Orders with < 6 Lines: 24 Hours • Orders with ≥ 6 Lines: 72 Hours *Complex Services) (requiring manual loop qualification)* • 2 wire Digital Services: 72 hours • 2 Wire xDSL Services: 72 hours *Special Services:* • Orders with < 6 Lines: 48 Hours • Orders with ≥ 6 Lines: 72 Hours [7]	**Electronically Submitted Orders:** *POTS/Pre-Qualified Complex:* • Flow-Through Orders: 2 Hours • Orders with < 6 Lines: 24 Hours • Orders with ≥ 6 Lines: 72 Hours *Complex Services(requiring manual loop qualification)* • 2 Wire Digital Services: 72 hours • 2 Wire xDSL Services: 72 hours *Special Services:* • Orders with < 6 Lines: 48 Hours • Orders with ≥ 6 Lines: 72 Hours [2]	**Electronically Submitted Orders:** *Firm Order Confirmation:* • ≤ 192 Trunks: 10 Business Days **Faxed/Mailed Orders:** Add 24 Hours to intervals above

Sub-Metrics		
OR-1-02	**% On Time LSRC – Flow Through**	
Products	*Resale:* • POTS/Pre-Qualified Complex	*UNE:* • POTS/Pre-Qualified Complex – Loop • Platform
Calculation	**Numerator**	**Denominator**
	Number of electronic LSRCs sent where confirmation date and time less submission date and time is less than 2 hours for specified product.	Total number of flow through LSRs confirmed for specified product.
OR-1-04	**% On Time LSRC/ASRC < 6 Lines (Electronic – No Flow Through)**	
Products	*Resale:* • POTS/Pre-Qualified Complex • 2 Wire Digital Services • 2 Wire xDSL Services [8] • Specials	*UNE:* • POTS/Pre-Qualified Complex -Loop • Platform • 2 Wire Digital Services • 2 Wire xDSL Services • Specials
Calculation	**Numerator**	**Denominator**
	Number of electronic LSRCs/ASRCs for less than 6 lines, sent where confirmation date and time less submission date and time is less than standard for specified product.	Total number of electronic LSRs/ASRs for less than 6 lines confirmed for specified product.
OR-1-06	**% On Time LSRC/ASRC ≥ 6 Lines (Electronic)**	
Products	*Resale:* • POTS/Pre-qualified Complex • Specials	*UNE:* • POTS/Pre-qualified Complex – Loop • Platform • Specials
Calculation	**Numerator**	**Denominator**

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[7]   Also includes orders requiring facility verification as specified on the Verizon Web-site for product intervals.

[8]   Where the separate data affiliate exists, re-sold xDSL services will not be included.

	Number of electronic LSRCs/ASRCs for 6 or more lines, sent where confirmation date and time less submission date and time is less than standard for specified product.	Total number of electronic LSRs/ASRs for 6 or more lines, confirmed for specified product.

Sub-Metrics OR-1 Order Confirmation Timeliness (continued)		
OR-1-12	% On Time FOC	
Products	Trunks: • CLEC Trunks (≤ 192 Forecasted Trunks)	
Calculation	Numerator	Denominator
	Number of orders confirmed within the specified interval for the product type	Number of orders received (electronically and faxed) confirmed by product type

Function:
OR-2 Reject Timeliness

Definition:

Reject Response Time:

The amount of elapsed time (in hours and minutes) between receipt of an order request and distribution of a service order reject, both based on date and time stamp.

Percent of Orders Rejected On Time:

The percentage of orders rejected within the agreed-upon timeframes as specified in the Performance Standards.

Notes:

(1) Rejected Orders – Orders failing "Basic front-end edits"[9] are not placed in the PON Master File.

(2) Measurements are based on rejected orders.

(3) The Ordering sub-metrics data reported in the monthly C2C reports only include orders rejected in the calendar month.

(4) The Pre-qualified Complex category includes 2-wire Digital, 2-wire xDSL Loop, and 2-wire xDSL Line Sharing orders that were pre-qualified.

Exclusions:

- Verizon Test Orders
- Duplicate Rejects – Rejects issued against a unique PON (PON + Version Number + CLEC Id), identical and subsequent to the first reject.
- Weekend and Holiday Hours (Other than Flow-through) – Weekend Hours are from 5:00pm Friday to 8:00am Monday. Holiday Hours are from 5:00pm of the business day preceding the holiday to 8:00am of the first business day following the holiday. These hours are excluded from the elapsed time when calculating the response times for non-flow-through requests. . Holidays vary by state and are published on the Verizon Web Site.
- SOP scheduled downtime hours (Flow-through). Scheduled downtime may vary by state. Each month there is a scheduled release on the third Saturday with a later start time on the following Sunday. For major release weekends, such as NPA splits, SOP downtime may be extended. All such extensions will be communicated to CLECs in advance of the release in accordance with Verizon Change Management guidelines.
- Verizon Affiliate data will be excluded from all CLEC aggregate performance (in all measures)
- DSL Orders requiring loop conditioning. (Due date can not be provided until conditioning is complete)

Report Dimensions :	
Company:	Geography:
- CLEC Aggregate - CLEC Specific	- State

Performance Standard:		
95% On Time According to schedule below:		
Resale:	UNE:	Interconnection Trunks:

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[9]   Basic front-end edits – see Glossary.

Electronically Submitted Orders: POTS/Pre-Qualified Complex:	Electronically Submitted Orders: POTS/Pre-Qualified Complex:	Electronically Submitted Orders:
• Flow-Through Orders: 2 Hours • Orders with < 6 Lines: 24 Hours • Orders with ≥ 6 Lines: 72 Hours *Complex Services) (requiring manual loop qualification)* • 2 wire Digital Services: 72 hours • 2 Wire xDSL Services: 72 hours *Special Services:* • Orders with < 6 Lines: 48 Hours • Orders with ≥ 6 Lines: 72 Hours [10]	• Flow-Through Orders: 2 Hours • Orders with < 6 Lines: 24 Hours • Orders with ≥ 6 Lines: 72 Hours *Complex Services(requiring manual loop qualification)* • 2 Wire Digital Services: 72 hours • 2 Wire xDSL Services: 72 hours *Special Services:* • Orders with < 6 Lines: 48 Hours • Orders with ≥ 6 Lines: 72 Hours [10]	• ≤ 192 Trunks: 10 Business Days **Faxed/Mailed Orders: Add 24 Hours to intervals above**

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[10]   Also includes orders requiring facility verification as specified in the interval appendix.

Sub-Metrics – OR-2 Reject Timeliness		
OR-2-02	% On Time LSR Reject – Flow Through	
Products	*Resale:* • POTS/Pre-Qualified Complex	*UNE:* • POTS/Pre-Qualified Complex – Loop • Platform
Calculation	**Numerator**	**Denominator**
	Number of electronic rejects sent where reject date and time less submission date and time is less than 2 hours for specified product.	Total number of flow-through LSRs rejected for specified product.
OR-2-04	% On Time LSR/ASR Reject < 6 Lines (Electronic – No Flow Through)	
Products	*Resale:* • POTS/Pre-Qualified Complex • 2 Wire Digital Services • 2 Wire xDSL Services [11] • Specials	*UNE:* • POTS/Pre-Qualified Complex – Loop • Platform • 2 Wire Digital Services • 2 Wire xDSL Services • Specials
Calculation	**Numerator**	**Denominator**
	Number of electronic rejects sent where reject date and time less submission date and time is within standard for orders less than 6 lines for specified product.	Total number of LSRs/ASRs electronically submitted for less than 6 lines rejected for specified product.
OR-2-06	% On Time LSR/ASR Reject ≥ 6 Lines (Electronic)	
Products	*Resale:* • POTS/Pre-qualified Complex • ·Specials	*UNE:* • POTS/Pre-qualified Complex – Loop • Platform • Specials
Calculation	**Numerator**	**Denominator**
	Number of electronic rejects sent where reject date and time less submission date and time is within standard for orders 6 or more lines for specified product.	Total number of LSRs/ASRs electronically submitted for 6 or more lines rejected for specified product.
OR-2-12	% On Time Trunk ASR Reject	
Products	Trunks: • CLEC Trunks	
Calculation	**Numerator**	**Denominator**
	Count of rejected trunk orders that meet reject trunk standard (10 days).	Count of rejected trunk orders for less than 192 trunks.

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[11]   Where the separate data affiliate exists, re-sold xDSL services will not be included.